

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 07-CV-5944-JST

MDL No. 1917

This Document Relates to:

**STIPULATION AND [PROPOSED] ORDER
RE: BRIEFING ON IRICO DEPOSITIONS
AND TRIAL SCHEDULES**

ALL DIRECT PURCHASER ACTIONS

Judge: Honorable Jon S. Tigar

1 Direct Purchaser Plaintiffs (“DPPs”), Indirect Purchaser Plaintiffs (“IPPs”) and Defendants
2 Irico Group Corporation and Irico Display Devices Co., Ltd. (“Irico” or the “Irico Defendants,”
3 collectively the “Parties”), by and through the undersigned counsel and pursuant to Federal Rule of
4 Civil Procedure 16(b)(4) and Civil Local Rule 7-12, hereby stipulate as follows:

5 WHEREAS, on August 11, 2022, the Court ordered that Irico witnesses must appear for
6 deposition by September 9, 2022 and, should they fail to appear, to submit a 15-page, double-
7 spaced joint statement on the Parties’ positions on the legal consequences of Irico’s witnesses not
8 appearing for deposition (ECF No. 6047);

9 WHEREAS, on August 22, 2022, the Court entered the Parties’ Stipulation and Order re:
10 Irico Depositions, extending the deadline to produce Irico witnesses Wang Zhaojie and Yan
11 Yunlong to the weeks of September 19, 2022, and September 26, 2022, respectively (ECF No.
12 6056) (the “Order”), in order to obtain the necessary visas;

13 WHEREAS, Mr. Wang appeared for deposition via videoconference from Macau from
14 September 20 to September 22, 2022;

15 WHEREAS, Mr. Yan is expected to appear for deposition via videoconference from Macau
16 beginning on September 27, 2022;

17 WHEREAS, the Irico Defendants previously agreed to produce Irico witness Su Xiaohua
18 for deposition, and the Court ordered them to do so (*see, e.g.*, January 10, 2022 Order, ECF No.
19 5980); however, the Irico Defendants have represented that Mr. Su resigned from all Irico-related
20 companies on May 25, 2022;

21 WHEREAS, the deposition of Mr. Yan will not take place prior to the current September
22 23, 2022, deadline to file joint statement on the Parties’ positions on the legal consequences of
23 Irico’s witnesses not appearing for deposition (the “Joint Deposition Statement”);

24 WHEREAS, on September 14, 2022, the Court entered an Order Re: Responses on Trial
25 Scheduling requiring the parties to meet and confer and submit a joint statement as to the proposed
26 process for the Irico trials in the DPP and IPP actions on September 30, 2022 (the “Joint Trial
27 Statement”) (ECF No. 6070); and,

1 WHEREAS, the parties are still considering their respective positions and, in light of the
2 ongoing depositions, have not yet had an opportunity to meet and confer regarding the Joint Trial
3 Statement, and agree that a brief, one-week extension of the current deadline is in the best interests
4 of the Parties and the Court;

5 IT IS HEREBY STIPULATED AND AGREED by and between counsel for DPPs, IPPs,
6 and the Irico Defendants that good cause exists to modify the deadlines to file the Joint Deposition
7 Statement and the Joint Trial Statement as follows:

8 1. The September 23, 2022, deadline for the Parties to file their Joint Deposition
9 Statement is extended to October 26, 2022, 30 days from the expected start of Mr. Yan's
10 deposition.

11 2. The September 30, 2022, deadline for the Parties to file their Joint Trial Statement is
12 extended to October 7, 2022.

13 **PURSUANT TO STIPULATION AND GOOD CAUSE APPEARING, IT IS SO
14 ORDERED.**

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16 Dated: _____

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18 HONORABLE JON S. TIGAR
19 UNITED STATES DISTRICT JUDGE
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1 Dated: September 23, 2022

2 /s/ R. Alexander Saveri

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14 *Plaintiffs*

15 /s/ John M. Taladay

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17 *Attorneys for Defendants Irico Group Corp.*
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ATTESTATION

I, John M. Taladay, hereby attest, pursuant to United States District Court, Northern District of California Civil Local Rule 5-1(i)(3), that each of the other Signatories have concurred in the filing of the document.

By: /s/ John M. Taladay
John M. Taladay